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REMARKS
STATUS

Claims 1-24 are pending in this application.

Claims 25-33 were withdrawn as non-elected in response to a restriction requirement.

Claims 1-22 and 24 were rejected under 35 USC 103 as being unpatentable over Tracker (designated via NPL URL).

Claim 23 was rejected under 35 USC 103 as being unpatentable over Tracker, as applied to claim 13, in further view of Brockwell (US 5,063,506).

Applicant's Arguments and Actions

Applicant herein affirms the non-election of claims 25-33 in response to the restriction requirement.

Claims 25-33 are cancelled herein.

Claims 3, 8, 16 and 17 have also been canceled herein.

Claims 1, 4-10, 12, 13, 18, and 20 have been amended.

New claim 34 has been added.

Claims 1, 2, 4-7, 9-15, 18-24 and 34 remain pending in this application.

This invention relates in general to methods for managing tool inventories and more particularly in one embodiment to a method for centrally controlling and tracking discrete inventories of tools housed at one or more tool depots where each depot may serve a plurality of remote job sites and where each inventory of tools is used to perform service activities at one or more of the remote job sites.

_____ *With regard to the 35 USC 103(a) rejection of claims 1-22 and 24 as being unpatentable over Tracker:*

Applicant has amended independent claims 1 and 13 to include limitations of presently canceled claims 3, 8 and 16, and 17 respectively, where in substantive part, a purchase order document is created in response to an order for the set of tools in the event at least one of the tools ordered is not available from the inventory of tools.

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The amendments to independent claims 1 and 13 are applicable to the relevant dependent claims.

The Examiner has admitted that "Tracker does not specifically disclose the limitation where a request for a tool not available in the database generates a vendor order for the requested tool per se." But then the Examiner incorrectly asserts (referencing page 15, paragraphs 2-4) that Tracker "discloses a tool purchase order system **coupled** to the tool inventory..." In fact, there is no coupling of the purchase order system to the tool inventory system in Tracker, but rather, the purchase order (po) information must be manually entered into the Tracker system. See for example line 1 of page 5 of Tracker where it clearly states that the "po" is entered into the header. Only after the purchase order information is entered into the header is it automatically entered for each detail item. Thus, there is no coupling of the purchase function and the tool inventory function in Tracker as asserted by the Examiner, and no *prima facie* case for obviousness has been established.

The Applicant's system includes a purchase order module which, among other things, interacts with other modules such as the tool catalogue module, the shipping module, and the inventory module. For example, once a purchase order is transmitted for processing, the inventory module will be automatically updated, see page 20, lines 16-31. Further, when the inventory module is updated to reflect a change in the available number of a tool, the inventory module automatically updates all records associated with the change in status for that item, see page 19, line 29 – page 20, line 3. Since the purchase order module communicates with the inventory module and the shipping module, upon notification a tool is needed, the purchase order module can place an order for the required tool via the control module or even transmit the order request directly to a vendor via the communications medium.

The close integration of the purchase order module, the inventory module, and the shipping module is reflected in the claim limitations and provides advance cross-module communication functionality not taught in Tracker.

In contrast, Tracker admits its purchase order option "... isn't a full blown purchase order management system" but rather is provided as an improvement over the "Add to stock function", see page 15, last paragraph. The purchase order option of

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Tracker allows the tracking of receipts against purchase orders but does not directly integrate the purchase order option with the inventory and shipping functions so that the electronic purchase order document is created in response to an order for a set of tools in the event at least one of the tools ordered is not available from the inventory of tools.

_____ *With regard to the 35 USC 103(a) rejection of claim 23 as being unpatentable over Tracker as applied to claim 13, in view of Brockwell et al.:*

Where independent claim 13 is allowable for the above reasons, claim 23 is also allowable.

_____ *With regard to new claim 34:*

New independent claim 34 is added including the limitations "in the event that the first tool order and the second tool order request a same item, assigning priority in the data processing system to the first tool order over the second tool order in response to the identification of the forced outage at the second power plant." These limitations are supported in the specification at page 16, lines 25-31. Nothing in the cited prior art teaches or suggests such limitations.

Reconsideration of the amended application in light of the above Remarks and allowance of claims 1, 2, 4-7, 9-15, 18-24 and 34 are respectfully requested.

Respectfully submitted,
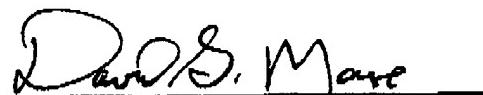
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